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Counsel to the GUC Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Case No. 20-32645-SGJ
	§	
MOVIE GRILL CONCEPTS LV, LLC, <i>et al.</i> , ¹	§	Chapter 11
	§	
Debtors.	§	Jointly Administered

STIPULATION AND AGREED ORDER RESOLVING STORE CLAIMS

Advisory Trust Group, LLC (the “**GUC Trustee**”), solely in its capacity as GUC Trustee of the GUC Trust (the “**GUC Trust**”), STORE Capital Acquisitions LLC (“**STORE Capital**”), and STORE Master Funding III, LLC (“**STORE III**” and, together with the GUC Trust and STORE Capital, the “**Parties**”)² hereby stipulate and agree as follows:

WHEREAS, on February 21, 2021, (a) STORE Capital filed a general unsecured claim against Debtor Studio Movie Grill Holdings, LLC (“**SMGH**”), designated as Claim No. 575 by the Claims Agent in the above-captioned proceedings (the “**STORE Capital Claim**”); and (b) STORE III filed four general unsecured claims against certain of the Debtors, designated as Claim Nos. 576 through 579 by the Claims Agent (collectively, the “**STORE III Claims**” and, together with the STORE Capital Claim, the “**STORE Claims**”), as follows:

Claim No.	Claimant	Debtor	Amount Asserted
575	STORE Capital	SMGH	\$8,026,962.84
576	STORE III	SMGH	\$662,432.97

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.donlinrecano.com/Clients/smgh/Index>.

² STORE Capital and STORE III are collectively referred to herein as the “**STORE Claimants**.”

577	STORE III	Movie Grill Concepts VII, LLC	\$662,432.97
578	STORE III	SMGH	\$922,658.93
579	STORE III	Movie Grill Concepts XXIII, LLC	\$922,658.93

and;

WHEREAS, this Stipulation has been negotiated in good faith and at arms'-length between the GUC Trustee and the STORE Claimants.

NOW, THEREFORE, THE GUC TRUST AND THE STORE CLAIMANTS AGREE THAT:

1. The above recitals are incorporated as if fully set forth herein.
2. The Parties agree that:
 - a. Claim No. 575 shall be liquidated, fixed, and allowed as a general unsecured claim against SMGH in the total amount of \$1,267,494.17.
 - b. Claim No. 577 shall be reduced to a general unsecured claim against Movie Grill Concepts VII, LLC in the amount of \$467,436.97, which amount may be reduced dollar-for-dollar by any future payment made by Brian Schultz as guarantor.
 - c. Claim Nos. 576, 578, and 579 shall be disallowed and expunged.
3. The STORE Claimants shall have no other claims against the chapter 11 Debtors other than the foregoing liquidated, fixed, and allowed general unsecured claims.

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AGREED TO AND SUBMITTED BY:

Dated: October 12, 2022

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Steven W. Golden
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Counsel to the GUC Trust

Dated: October 12, 2022

BALLARD SPAHR LLP

By: /s/ Craig Solomon Ganz
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Counsel to the STORE Claimants

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of October, 2022, a true and correct copy of the foregoing document was served on all parties consenting to electronic service of this case via the Court's ECF system for the Northern District of Texas.

/s/ Steven W. Golden
Steven W. Golden